Chemillé, 20/12/2000

US Department of Transportation Dockets
Docket n° FAA-2000-7909
400, Seventh Street SW
Room Plaza 401
Washington DC 20590
United States of America

N/Réf : JM 122000

Subject : Comments on Improved Flammability Standards for Thermal/Acoustic Insulation Materials Used in Transport Category Airplanes proposed rule.

Dear Sirs,

The Jehier Company is hereafter sending its comments on the 14CFR Parts 25,91,121,125,and 135 (Docket N° FAA-2000-7909;Notice N°00-09) RIN 2120-AG91 Improved Flammability Standards for Thermal/Acoustic Insulation Materials Used in Transport Category Airplanes; proposed rule.
For easiness , we make reference to the concerned pages of the document Vol. 65, N° 183/Wednesday,September 20,2000.
page 56995:

"25.856 which would address thermal/acoustic insulation materials wherever installed"

Some thermal/acoustic insulation materials are ,when needed ,installed in areas like wings,engines,nacelles, APU compartment. Are they requested to be tested under the radiant panel ?
page 57002:

figure 1: the chimney is shown behind the glass viewing window. To be shorten

The dimension "1400mm" should be "1397 mm"

page 57003:

-the proposed insulated chimney is showing an internal surface of evacuation compared to the non insulated chimney (described in ASTM E 648) . We propose to use the non insulated chimney (described in ASTM E 648) already used during development of the proposed test method.

-The dimension "1400mm" should be "1397 mm"

-The dimension "500mm" should be "495 mm"

page 57004:

-"for any material tested" to be deleted.

-How to demonstrate equivalency of an electric panel ?

- 1500°F (816°C) can't be reached by electric panel made by Watlow .However, this panel is considered as a potential alternative to air-propane radiant panel.

-Figure 3b:The same electric panel made by Watlow is showing external dimensions 14" by 18"7/8
and radiant surface dimensions 13" by 18"7/8.Emitter strips are perpendicular to the length of the panel.

page 57005:

-30§ should be 30°

-figure 4: The dimension " .43mm" should be "11.1mm"

page 57006:

-figure 5: The dimension "320mm" should be "324 mm"
The dimension "140mm" should be "200 mm"

page 57007:

-figure 6:the dimensions 39"1/2(1003mm) and 7"1/2(190mm) should be changed to dimensions in the text "exposed area of test specimen exposed to the radiant panel is 39"1/4 by 7"1/4(996 by 184mm)"

In fact :exposed area of test specimen is corresponding to the securing frame specimen opening.

-the dimensions 39"1/2(1003mm) and 7"1/2(190mm) in the text should be deleted

page 57008:

-The dimension "5.6 Watts/cm2" should be "5.7 Watts/cm2"

-The dimension "0-5 Watts/cm2" should be "0-6.4 Watts/cm2"

-The dimension "47 mm" should be "48 mm"

page 57009:

-figure 8: The dimension "335mm" should be "337 mm"
The dimension "45.7mm" should be "48 mm"
The dotted line showing dimension 1"7/8 is not made " centreline of the first hole" as described in page 57008

page 57010:

-The dimension "1.8 Watts/cm2" should be "1.7 Watts/cm2"

page 57011:

requirements (2)to be replaced by

"the three specimens tested may not continue to flame for more than an average of 5 seconds"

This requirement is consistent with requirements for materials other than thermal /acoustic insulation materials(and requested to meet the vertical bunsen burner test according to part I of appendix F)

We remain at your disposal for further information.
Best regards,

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